

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

TOTAL RX CARE, LLC,

Plaintiff,

v.

GREAT NORTHERN INSURANCE
COMPANY,

Defendant.

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CIVIL ACTION NO. 3:16-cv-2965

JURY DEMAND

**JOINT MOTION TO TEMPORARILY STAY DETERMINATION OF
PLAINTIFF'S MOTION TO COMPEL PRODUCTION OF DOCUMENTS [DKT. 31]**

Plaintiff Total Rx Care, LLC ("Total Rx") and Defendant Great Northern Insurance Company ("Great Northern") are engaged in ongoing meet and confer efforts in an attempt to narrow or eliminate the issues in dispute in Plaintiff's Motion to Compel Production of Documents [Dkt. 31] (the "Motion"). Thus, Total Rx and Great Northern request that the Court stay any determination of the Motion for at least twenty-one days while the parties continue to meet and confer regarding the Motion.

The parties have also agreed to file a joint pleading at the end of the twenty-one day period to advise the Court of any issues that remain outstanding following the stay.

Dated: June 7, 2017

Respectfully submitted,

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/s/ Robert M. Hoffman

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CERTIFICATE OF SERVICE

Pursuant to the Federal Rules of Civil Procedure, this pleading was served on all counsel of record via electronic service.

/s/ Robert M. Hoffman

Robert M. Hoffman